

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

DAVID GARCIA,
a/k/a "Mexico,"
MIGUEL GARCIA,
RAKEIM MURRAY, and
a/k/a "Lite,"

Defendants.

SEALED INDICTMENT

16 Cr. ____

16 CRIM 012

COUNT ONE

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 1/16/16

The Grand Jury charges:

1. From at least in or about January 2015 up to and including at least in or about December 2015, in the Southern District of New York and elsewhere, DAVID GARCIA, a/k/a "Mexico," MIGUEL GARCIA, and RAKEIM MURRAY, a/k/a "Lite," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that DAVID GARCIA, a/k/a "Mexico," MIGUEL GARCIA, and RAKEIM MURRAY, a/k/a "Lite," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that DAVID GARCIA, a/k/a "Mexico," MIGUEL GARCIA, and RAKEIM MURRAY, a/k/a "Lite," the defendants, conspired to distribute and possess with intent to distribute was mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the controlled substance offenses alleged in Count One of this Indictment, DAVID GARCIA, a/k/a "Mexico," MIGUEL GARCIA, and RAKEIM MURRAY, a/k/a "Lite," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting and derived from any proceeds the defendants obtained directly and indirectly as a result of the offense and any and all property used and intended to be used in any manner and part to commit and to facilitate the commission of the offense alleged in Count One of this Indictment.

Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the said defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the said defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

M. Noller
FOREPERSON

1/6/16

Preet Bharara
PREET BHARARA ^{MBJ}
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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Defendants.

INDICTMENT

16 Cr. ____

(Title 21, United States Code,
Sections 846, 841(b)(1)(C), 853.)

PREET BHARARA

United States Attorney.

A TRUE BILL

M. Kohlmeier

1/6/16 Foreperson.

1/6/16. Filed Sealed Indictment
dc A/w sealed J. Park
USM